

REMARKS

Claims 1-24 are pending in the application.

Claims 1-24 stand rejected.

Claims 1-4 and 9-12 have been amended.

Examiner Interview

Appreciation is expressed for the telephonic interview conducted on 4/13/2009 between Examiner Obeid and Samuel G. Campbell III, Applicants' attorney (Reg. No. 42,381). During the interview, the Katz reference (U.S. Patent Publication No. 2002/0178077) was discussed with reference to independent claim 1. While no agreement was reached during the interview, the undersigned believes this paper is in harmony with the positions expressed during the interview.

Rejection of Claims Under 35 U.S.C. § 102

Claims 1-24 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent Publication No. 2002/0178077, naming Katz et al. as inventors ("Katz"). Applicants respectfully traverse this rejection.

Independent claim 1, as amended, recites the following limitations:

synchronizing inventory location information in a computerized inventory management system, wherein
the computerized inventory location management system comprises
a plurality of source computerized inventory management systems, and
a plurality of target computerized inventory management systems, and
the synchronizing comprises
extracting inventory location information in a source format, wherein
the source format corresponds to a source computerized inventory management system, and
the source computerized inventory management system is one of the plurality of source computerized inventory management systems,

converting the inventory location information in the source format into inventory location information in an intermediate format, and
converting the inventory location information in the intermediate format into inventory location information in a target format, wherein
the target format corresponds to a target computerized inventory management system, and
the target computerized inventory management system is one of the plurality of target computerized inventory management systems.

Independent claim 9, as amended, recites similar limitations. Applicants submit that Katz fails to teach or suggest: (1) synchronizing inventory location information between a plurality of source computerized inventory management systems and a plurality of target computerized inventory management systems; and (2) synchronizing comprising a conversion of inventory location information in a source format into an intermediate format and then conversion of the intermediate format into a target format, where the source is one of a plurality of source computerized inventory management systems and the target is one of a plurality of target computerized inventory management systems.

The synchronizing limitation is a newly amended limitation, and as such, there is no discussion of this limitation being taught by Katz in the present Office Action. Further, Applicants submit that Katz fails to teach any construct comparable to the claimed synchronization because Katz is not concerned with synchronizing a plurality of source systems with a plurality of target systems. Katz is directed to integrating various types of data into a form compatible with a single system, Katz's Value Chain Intelligence (VCI) system. *See* Katz, ¶¶ [0012]-[0013], [0042], [0190], and [0054].

This is to say that Katz only transforms external data into one format, that of the VCI system. Because Katz only discloses the single VCI system as the endpoint of the various transformations, Katz is incapable of teaching or suggesting synchronizing inventory location information between a plurality of source computerized inventory management systems and a plurality of target computerized inventory management systems.

Further, because Katz teaches only the single VCI system, there is no need at all for Katz to use any intermediate format in order to bring data into the VCI system from a given data source. Any given data source in Katz only needs to be transformed from the

given source data directly into data compatible with the VCI system. *See* Katz, ¶¶ [0012]-[0013], [0042], [0190], and [0054]. Given the single VCI system in Katz with, say, n data sources, there need only be n transformations – from each data source to the VCI system format. By contrast, in a system with n source systems and m target systems, there will need to be $n*m$ conversions – one conversion from each of the n source systems to each of the m target systems. However, if a common intermediate format is introduced into the n source, m target system, the number of conversions necessary is reduced to $n + m$. The reduction occurs because only n conversions are necessary to convert each of the n source formats to the single intermediate format and only m conversions are necessary to convert from the single intermediate format to each of the m target formats. By using an intermediate format, it is no longer necessary for the claimed invention to convert from each of the n source systems to those of each of the m target systems – the claimed system need only be able to convert from each of the source formats to the single intermediate system, and then from the intermediate format to that of each of the target formats.

Of course, instead of a single conversion from source system to target system, with the intermediate format it now becomes necessary for two conversions to occur to move data from a source system to a target system: the conversion from the source format to the intermediate format and the conversion from the intermediate format to the target format. The second conversion, necessary to go to and from the intermediate format, is the trade-off for reducing the number of direct conversions that would be required otherwise. However, another benefit is that when a target system is added, no new conversions need to be introduced to any of the source systems because the claimed invention still need only provide a conversion from each source system to the single intermediate format. Thus, the added target system results in only a single extra conversion: from the intermediate format to the new target format. The plurality of source systems are unaffected by the addition of the new target system. The result is constant value scalability.

Katz only has the single VCI system as the endpoint of each transformation. Thus, Katz need only perform a transformation from each data source's format into that of the single VCI system. Given only the need for direct transformations from a plurality of sources to the single VCI system, there is no need of an intermediate format. In fact, such an extra conversion step would not only be pointless, but would be counter-productive by expanding the computing resources necessary. This explains the complete lack of teaching of anything like the claimed intermediate format within the cited passages of Katz. Thus, it cannot be said that Katz teaches or suggests synchronizing that comprises a conversion of inventory location information in a source format into an intermediate format and then conversion of the intermediate format into a target format, where the source system is one of a plurality of source computerized inventory management systems and the target system is one of a plurality of target computerized inventory management systems.

For at least these reasons, Applicants submit that Katz does not provide disclosure of all the elements of independent claims 1 and 9, and dependent claims 2-8 and 10-24, and that these claims are in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

CONCLUSION

In view of the amendments and remarks set forth herein, the Application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "S. G. Campbell III", with a stylized flourish at the end.

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